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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

MARIA JIMENEZ,

Plaintiff,

vs.

GEICO GENERAL INSURANCE
COMPANY, an entity licensed to do business
in the State of Nevada; DOES I through V; and
BUSINESS ENTITIES VI through X,
inclusive,

Defendants.

CASE NO.: 2:19-cv-00984-APG-VCF

**STIPULATION AND ORDER TO
EXTEND THE PRE-TRIAL ORDER
DEADLINE (FOURTH REQUEST)**

Plaintiff Maria Jimenez (“Plaintiff”), by and through her attorneys of record of GGRM Law Firm, and Defendant GEICO General Insurance Company (“GEICO”), by and through its attorneys of record of the law firm McCormick, Barstow, Sheppard, Wayte, & Carruth LLP, hereby file this Stipulation and Order to Extend the Pre-Trial Order Deadline (Fourth Request), specifically seeking to extend the deadline by 60 days.

IT IS HEREBY STIPULATED AND AGREED between the parties to extend the joint pre-trial order deadline of March 8, 2021. In accordance with Local Rule 26-4, the parties state as follows:

I. DISCOVERY COMPLETED BY THE PARTIES:

The parties have served their initial disclosures. Both parties have propounded and answered written discovery. Plaintiff’s deposition testimony was provided on February 6, 2020.



1 **II. DISCOVERY WHICH REMAINS TO BE COMPLETED:**

2 For all intents and purposes, discovery has concluded, and the parties merely seek to
3 extend deadline to submit the join pre-trial order.

4 As noted above, the parties have been working diligently throughout the discovery
5 process and discovery has effectively concluded but for the joint pre-trial order. Currently, the
6 parties have a mediation scheduled for March 18, 2021. The parties believe the mediation will
7 help accelerate this matter towards a resolution without proceeding to trial.

8 **III. GOOD CAUSE EXISTS TO GRANT THE REQUESTED EXTENSION**

9 If the mediation proves to be beneficial and the parties agree to a resolution, a Pre-Trial
10 Order will be unnecessary. Should the mediation conclude at a stalemate, the parties are ready
11 to proceed with a trial.

12 The parties request that the pertinent discovery deadlines set forth in the Court's
13 Scheduling Order be continued ninety (60) days, as follows:

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1 A. PRETRIAL ORDER: Unless otherwise stated herein, and the Court so orders,
2 the joint pretrial order shall be filed ~~ninety~~ (60) days from its current deadline of March 8, 2021,
3 but not later than May 7, 2021.

4 DATED this 5th day of March, 2021.

5 **GGRM LAW FIRM**

6
7 */s/ William T. Martin*

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9 Nevada Bar No. 11541

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11 Nevada Bar No. 2534

12 **GGRM LAW FIRM**

13 2770 S. Maryland Pkwy., Ste. 100

14 Las Vegas, NV 89109

15 *Attorneys for Plaintiff*

DATED this 5th day of March, 2021.

MCCORMICK, BARSTOW, SHEPPARD,

WAYTE & CARRUTH LLP

/s/ Jonathan W. Carlson

WADE M. HANSARD, ESQ.

Nevada Bar No. 8104

JONATHAN W. CARLSON, ESQ.

Nevada Bar No. 10536

8337 W. Sunset Road, Suite 350

Las Vegas, Nevada 89118

Attorneys for Defendant

16 **ORDER**

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19 **IT IS SO ORDERED:**

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21 DATED this 5th day of March, 2021

22 IT IS HEREBY ORDERED that the
23 Joint Pretrial Order must be filed on
24 or before May 10, 2021.

25 If dispositive motions are filed, the
26 deadline for filing the joint pretrial
27 order will be suspended until 30
28 days after decision on the
dispositive motions or further court
order.


UNITED STATES MAGISTRATE JUDGE



CERTIFICATE OF SERVICE

Pursuant to FRCP 5, I certify that I am an employee of GGRM LAW FIRM, and that on the 5th day of March, 2021, I caused the foregoing document, entitled **STIPULATION AND ORDER TO EXTEND THE PRE-TRIAL ORDER DEADLINE (FOURTH REQUEST)** to be served via electronic service and/or US Mail upon all parties involved in this litigation.

/s/ Michael Madden

An Employee of GGRM LAW FIRM

